

PRELIMINARY DRAFT

NOTE: The following is a draft of a possible nonproject review form to replace the current environmental checklist and supplemental sheet D for nonproject actions. Revisions are likely to occur before a final draft form is circulated for public review.

STAFF ITERATION	____	DATE	_____	STAFF	_____
SCOPING ITERATION	____	DATE	_____	STAFF	_____
INTERIM ITERATIONS					
Staff	__	Public	__	DATE	_____
Staff	__	Public	__	DATE	_____
Staff	__	Public	__	DATE	_____
Staff	__	Public	__	DATE	_____
PROPOSED ACTION ITERATION					
DNS	_____	DATE	_____	RESPONSIBLE OFFICIAL	_____
DS	_____	DATE	_____	RESPONSIBLE OFFICIAL	_____
DS/DEIS	_____	DATE	_____	RESPONSIBLE OFFICIAL	_____

State Environmental Policy Act (SEPA) Non-Project Review Form (NPRF)

The nonproject review form (NPRF) is to be used concurrently with the development of a nonproject proposal. To achieve maximum effectiveness and efficiency, the initial use of the form should begin at the same time as a nonproject action is being contemplated, i.e., upon identification that a plan, policy or rule is likely to be needed or is mandated.

- Iterative process: The form is designed so that as a proposal is developed, the form is updated and detail is added. When a complete draft proposal is ready for public review, or review by an intermediary governmental body (e.g., a planning commission), the form should be at a comparable draft state, similar to a draft environmental impact statement (DEIS).
- Initial completion of the form: All questions and requests for information should be reviewed when a nonproject proposal is contemplated, recognizing that at this stage it is premature to respond to some questions and some of the answers will change as the proposal is developed. Generally, at the initial stages, Part I of the NPRF can be fully completed and the first several questions in the remainder of the sections can be preliminarily answered.

PART I - BACKGROUND

1) Background

- a) Name of proposal, if any, **and brief description.**
- b) Agency and contact name, address, telephone, fax, email
- c) Designated responsible official
- d) Description of the planning process schedule/timeline
- e) Location - Describe the jurisdiction or area where the proposal is applicable.
(Attach map if appropriate)
- f) What is the legal authority for the proposal?

2) Need and Objectives

- a) Describe the problem to be addressed and the need for the action.
- b) Describe the primary objective(s) of the proposal.
- c) Are there any other objectives, including environmental? If so, describe.

3) Related Documentation

- a) Identify and briefly describe any similar or related plan, regulation, policy, etc., currently in effect governing this geographic area and that contains the means to further the primary objective.
- b) Is this proposal likely to result in an amendment to, or replacement of, any existing regulation, policy or plan? Briefly describe.
- c) List any environmental documents (SEPA or NEPA) that have been prepared for items identified in 3(a) above. **NOTE: impacts with previous adequate analysis need not be re-analyzed, but should be incorporated by reference into the NPRF.)** Identify the:
 - i) Type of document,
 - ii) Lead agency and issue date,
 - iii) Where copies can be obtained, and
 - iv) A brief summary of the primary objectives, impact analysis from the alternatives being considered, type of mitigation considered, and monitoring process.
- d) List any environmental documents/studies/models that need to be or have been prepared for fulfilling data/information gaps prior to proposal adoption.

4) Planning Processes/Approaches & Public Involvement Strategy

- a) Identify any assumptions or constraints, including legal mandates that limit the approach or strategy to be taken in pursuing the objectives.
- b) If there is no legislative or other mandate that requires a particular approach, what type of approaches could reasonably achieve the objectives?
- c) Why was the approach presented in the proposal selected?

- d) Who are the known primary stakeholders?
- e) What other agencies are involved and for what reason?
- f) What types of processes will be used for soliciting, evaluating, and documenting input from stakeholders, agencies, tribes and the public?
- g) **If different from above, briefly describe the processes used in addressing the concerns and comments of the public and other interested parties.**

(5) Long Range Consequences

- a) If the primary objectives are met, is it likely that the nonproject action will direct or encourage physical changes to the environment? Broadly describe the type and degree of likely changes in terms of increase in development and infrastructure or changes to how an area will be managed.
- b) Describe any future options that will be precluded if the primary objective is met.
- c) What other nonproject actions will be necessary to achieve the objectives of this action?

(6) Existing Environment

- a) Generally describe the existing environmental landscapes or elements (i.e., status or quality of ecosystem) likely to be affected if the proposal is implemented. Include a description of the existing environment where resulting “on the ground” activities may occur and areas and facilities likely to be impacted. The following should be included, as appropriate:

◆ Natural Environment:

- (i) Native vegetation & forested areas
- (ii) Riparian, floodway, and conservancy corridors
- (iii) Groundwater recharge areas
- (iv) Surface water systems: lakes, streams and wetlands
- (v) Endangered/threatened species in or near the area

◆ Built Environment:

- i) Stormwater and detention ponds systems
- ii) Hazardous/human waste storage areas
- iii) Commercial, industrial and residential areas
- iv) Shoreline and wetland alterations
- v) Percent impervious surfaces (approximate)
- vi) Unique features, including historic and cultural sites
- vii) Transportation and public utilities

b) Regulatory Environment

Describe the existing regulatory planning framework as it may affect or guide the proposal, such as:

- (i) Urban Growth Areas
- (ii) Shoreline Management Areas
- (iii) Current Zoning
- (vi) Potential or existing critical areas, resource lands, etc.
- (vii) State and/or federal environmental regulations

PART II – IMPACT ANALYSIS AND ALTERNATIVES

(7) Key Issues/Questions, Alternatives & Preliminary Decisions

- a) Identify the current known or anticipated key environmental issues or areas of controversy or concern. Include a brief statement of why this is a key issue.
- b) Identify alternative solutions or responses for each key issue/concern listed above.
- c) Identify environmental considerations/impacts relevant to each of the alternative solutions/responses identified.
- d) What choice (preliminary decision), if any, was made regarding each key issue?
- e) Identify any choice that will commit the agency and that may have an adverse effect on the environment.
- f) Which alternatives will be carried forward for further analysis?
- g) For those choices not carried forward briefly describe why not?

(8) Proposed Nonproject Action or Alternative Actions

Describe a range of alternatives or the preferred alternative that will meet the objectives.

(9) Cumulative/Indirect Impacts and Mitigation

- a) If this alternative were fully implemented, how and where would it direct or encourage an:
 - Increase in infrastructure?
 - Increase in development?
 - Increase in demand for public services?
- b) What are likely impacts from new development, redevelopment, changes in land use, density of use, and management practices resulting from this proposal?
 - Removal or degradation of native or aquatic vegetation?
 - Increase in impervious surfaces?
 - Removal/diversion of surface waters?
 - Limits to the ability of groundwater or aquifers to recharge?
 - Encroachment on riparian corridors, floodway zones, conservation priorities, shoreland designations, and other regulatory setbacks/buffers?
 - Degradation of environmental health, i.e., increase of bacteria?
 - Degradation of other ecological processes, e.g., hydrology cycle?
 - Limits on the quantity/quality of public drinking water and air supply?
 - Burdens on existing stormwater, detention ponds, traffic patterns, storage of hazardous/human waste capacities, and other infrastructures?
- b) What are potential mitigation measures for these impacts?
- c) Will the intent of the proposal still be met if these impacts occur?

PART III – IMPLEMENTATION CONSIDERATIONS

(10) Consistency of the proposal with other plans, policies and laws.

- a) Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies.
- b) External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies.

(11) Unavoidable impacts and impacts to be addressed later.

- a) For GMA actions, what impacts from the proposal have been designated as acceptable under chapter 36.70A RCW?
- b) Identify what impacts have been left to be addressed at the project level (i.e., thresholds which trigger further environmental analysis at the project level).

(12) Monitoring and Follow-up

- a) How will the proposed action be monitored to ensure the impacts were as predicted and the mitigation is effective? Who will do the tracking? How will it be done? etc.
- b) How will the impacts of the proposal be measured in relation to any benchmarks, performance standards and/or thresholds identified in the proposal?